

BEFORE THE  
POSTAL REGULATORY COMMISSION  
WASHINGTON, DC 20268

In the Matter of:

Prairie Hill, Texas 76678  
Post Office State Zip Code

Docket No: A2011-50

PETITIONER/APPELLANT REPLY  
COMMENTS TO UNITED STATES POSTAL SERVICE'S  
COMMENTS REGARDING APPEAL  
(October 27, 2011)

On August 18, 2011, the Postal Regulatory Commission (Commission) received an appeal postmarked August 12, 2011, from postal customer Stell Waldrop, Jr. ("Petitioner") objecting to the discontinuance of the Post Office at Prairie Hill, Texas. On August 22, 2011, the Commission issued Order No. 820, its Notice and Order Accepting Appeal and Establishing Procedural Schedule under 39 U.S. C. 404(d). In accordance with Order No. 820, the administrative record was filed with the Commission on September 2, 2011. The Petitioner filed a Participant Statement on September 22, 2011, in support of the petition. On October 6, 2011, the United States Postal Service filed comments regarding the appeal.

The appeal and the Participant Statement raise three issues: (1) the impact on the provision of postal services, (2) the impact upon the Prairie Hill community, and (3) the calculation of economic savings expected to result from discontinuing the Prairie Hill Post Office.

The United States Postal Service's comments do not refute Petitioner's position in the original appeal and Participant's Statement that the determination to discontinue the Prairie Hill Post Office is not in accordance with statutory requirements. Therefore, the determination should be remanded.

Notwithstanding any other considerations, the Post Office closing clearly violates Title 39 U.S.C. 101(b) which states that the Postal Service shall provide a maximum degree of effective and regular postal service to rural areas, communities, and small towns where post offices are not self-supporting. No small post office shall be closed solely for operating at a deficit, it being the specific intent of the Congress that effective postal services be insured to residents of both urban and rural communities.

Contrary to Postal Service's comments, the closure as stated in the Final determination cites low revenue, a minimal workload, and the postmaster vacancy as three principle reasons for closure. A postmaster vacancy is not a valid reason for closure. Low revenues and minimal workload are precisely what creates a deficit.

Accordingly, the closure is in direct violation of 39 U.S.C. Section 101(b) and should be remanded. Other delivery options such as rural carrier or CBU's are irrelevant in this matter.

### Economic Savings

The Postal Service has also failed to adequately address Petitioner's questions about the economic savings calculations. The Postal Service states in their October 6, 2011 comments that the responsible personnel are well versed in the costs of replacement service and relied upon their expertise to make the calculations. The Postal Service has every reason to believe that the calculations in the record are accurate and the Petitioner does not provide a reason to believe otherwise.

As shown, the Postal Service still has not provided details to support their calculations which was the Petitioner's original question in the Participant's Statement.

The primary amount in the Postal Service's economic savings of \$49,097 set forth in the final determination was a Postmaster Salary (EAS-11) of \$33,168 plus fringe benefits of \$11,111 for a total of \$44,279. It should be noted that the postmaster position has been vacant since July 05, 2007 when the postmaster was promoted. This employee is still employed with the Postal Service at a higher salary.

Therefore, as the employee will not be separated as a result of closing the Prairie Hill Post Office the inclusion of such salary and benefits is not a true savings to the Post Office and should not be considered as such. The only verifiable cost savings figure in the Postal Service's calculations would be the annual lease costs of \$8,712. Accordingly, the true economic savings are grossly overstated and distorted and should be reduced by the amount of the Postmaster salary and benefits.

The Postal Service Final Determination shows office receipts of \$12,831 for FY 2010 for the Post Office.

In summary, the true economic savings calculations are flawed and would appear to be minimal whereas the effect of closing the Post Office would have a major detrimental effect on the community and its patrons.

Based on the facts presented, the Postal Service's determination to close the Prairie Hill Post Office has not been adequately justified and is not in accordance with applicable laws and regulations as set forth in the record. We respectfully request that the closure determination be remanded.

Stell Waldrop, Jr.  
Petitioner/Appellant